



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street
New York, New York 10007*

December 20, 2024

BY ECF

The Honorable Jennifer L. Rochon
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

*Re: The New York Times Company v. United States Department of State,
No. 24 Civ. 8747 (JLR)*

Dear Judge Rochon:

This Office represents Defendant United States Department of State in the above-referenced case brought by Plaintiffs The New York Times Company and Amy Julia Harris, pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552. I write respectfully pursuant to Part 1.F of the Court's Individual Rules of Practice to request an extension of time to respond to the complaint in this matter. Plaintiffs consent to this request.

On November 18, 2024, Plaintiffs filed the complaint in this action. *See* Dkt. No. 1. The complaint was served on this Office on November 22, 2024. Pursuant to 5 U.S.C. § 552(a)(4)(C), Defendants' response to the complaint is currently due on December 23, 2024. This Office requires additional time to confer with the Department of State concerning the FOIA requests submitted to them by Plaintiffs and to assess the facts of and claims asserted in this FOIA action. Defendant respectfully requests an extension of time to respond to the complaint to January 8, 2025. This is Defendant's first request for an extension, and, as noted above, Plaintiffs consent to this request.

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We thank the Court for its consideration of this request.

Respectfully submitted,

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cc: All counsel of record (via ECF)